

August 14, 2007

Hon. Louis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Danny Leo, et al.
Indictment No.: S31 06 Cr. 08 (LAK)

Dear Hon. Kaplan:

Please be advised that on Friday, August 10, 2007, I appeared in the Magistrate's Court on the above-captioned matter for arraignment upon Mr. Leo's Superceding Indictment. After imposing a plea of not guilty and requesting a trial by jury, I further requested, with defendant's consent, a waiver of speedy trial until September 4, 2007. The Magistrate granted my application. It is my understanding that a conference before you upon this indictment has been established for this date.

Further, via this correspondence, and upon consent of the government, it is respectfully requested that the motion schedule previously established prior to Mr. Leo's most recent Superceding Indictment be extended. Over the course of the past several days, counsel has received discovery from the government in excess of 1,800 pages, with accompanying audio and video tapes. Apparently, it is the government's intention to serve additional discovery in the near future.

By reason of the foregoing, counsel respectfully requests that a new motion schedule be established at our meeting on September 4, 2007.

Thank you for your consideration of this matter.

Very truly yours,

Lawrence V. Carra', Esq.

LVC:ag